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August 2, 2001

Roger Peterson
State of Wisconsin
Office of the Commissioner of Insurance
121 East Wilson Street
Madison, Wisconsin 53707-7873

Steve Junior
State of Wisconsin
Office of the Commissioner of Insurance
121 East Wilson Street
Madison, Wisconsin 53707-7873

RE: SEC No-Action Request Letters

Dear Messrs. Peterson and Junior:

Per your request, I've enclosed copies of the SEC "no-action" confirmation letters we received in connection with the Liberty Mutual mutual holding company reorganizations. The language we discussed concerning dividends appears on our EIW letter (page 8, the paragraph right above "III DISCUSSION") and is relied upon the SEC in their approval letter (page 2, last bullet).

I've also enclosed, for your reference, copies of the Liberty Mutual Insurance Company and Liberty Mutual Fire Insurance Company Supplements to the respective Policyholder Information Statements.

Please feel free to call me at (212) 735-2653, with any questions or comments you may have regarding the enclosed materials.

Sincerely,

/s/: J. Stephanie Nam

J. Stephanie Nam

Enclosures

Roger Peterson
Steve Junior
September 27, 2001
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cc: Stan Hoffert (w/ enclosures)
Craig Olafsson (w/ enclosures)
Richard Quinlan (w/o enclosures)
David May (w/o enclosures)
Noreen Parret (w/ enclosures)
Robert Sullivan (w/o enclosures)
Lara Zaitzeff (w/o enclosures)